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Joseph A. Marutollo
Deputy Chief, Civil Division
Chief, Immigration Litigation
United States Attorney's Office
Eastern District of New York
271-A Cadman Plaza East, 7th Floor
Brooklyn, New York 11201

RE: DHS Immigration Enforcement Subpoena No. ERO-ENF-NYC-202000007
(Reeaz Khan)

Dear Mr. Marutollo:

As indicated in New York City's letter to U.S. Immigration and Customs Enforcement Field Office Director Decker on January 31, 2020, we have grave concerns that the four subpoenas issued by ICE lack a legitimate purpose, and are instead a political stunt intended to exploit tragic circumstances and intimidate the City of New York into changing its laws and policies concerning the health and safety of New Yorkers and their trust in government. Our concerns have only grown stronger since similar tactics have been taken by the federal government against Connecticut¹, Denver, and San Diego².

While the City maintains these concerns, we have reviewed the unique circumstances in this matter, and will furnish responsive records and information in this matter that is within our possession and control.

¹ <https://www.ice.gov/news/releases/ice-issues-subpoenas-obtain-information-refused-under-connecticuts-sanctuary-policies>

² <https://www.ice.gov/news/releases/ice-subpoenas-information-requested-under-california-sanctuary-policies>

In the interest of working with the U.S. Attorney's Office to resolve this specific case, and without conceding any facts or legal arguments put forward in the Order to Show Cause, the City is producing documents totaling 3 pages, including (1) the arraignment and classification risk (ACR) screening form for Reeaz Khan, and (2) the New York City Department of Correction Inmate Lookup Service (ILS) Public Lookup printout relating to Reeaz Khan, which is publicly available information. The City cannot verify the accuracy of all of the information provided on the ACR to the extent it is self-reported information. Non-responsive information has been redacted.

The documents contain the following responsive information:

- Home Address: *included on the ACR*
- Employment Address: *None provided*
- Country of Birth: *included on the ILS Public Lookup printout as "Nativity"*
- Place of Birth: *"Nativity" is the only available information*
- Age: *included on the ACR as DOB*
- Identification Documents (i.e., driver license number and state, foreign identification card number and country, passport number and country): *None provided*
- Federal Bureau of Investigation Number: *The Department of Correction does not have this number on a document it can provide. The Department is not in possession of a full fax cover sheet from ICE on this individual. The only document the Department has with the FBI number is the RAP sheet, which it is prohibited by federal law (and by its agreement with DCJS on data use) from disclosing.*
- Emergency Contact address and phone number: *address only, included on the ACR. No phone number was provided.*
- Copies of all identification documents: *None provided*

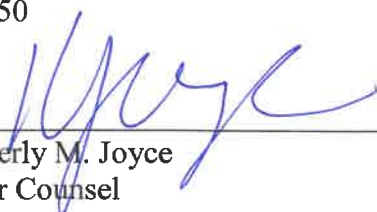
In response to the request for documents that show the criminal charge relating to Reeaz Khan where the arrest date was January 10, 2020, and the charge was Murder, under docket #CR-000902-20QN:

- Arrest Date and Charge: *included on the ILS Public Lookup printout*

The enclosed production represents the entirety of responsive records and thus fully satisfies this matter.

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By: _____


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